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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MANUEL L GARCIA,
Plaintiff,

vs.

KILOLO KIJAKAZI,
Acting Commissioner of Social Security,
Defendant.

)
) Case No.: 2:18-cv-02226-SCD
)

) **UNOPPOSED MOTION FOR EXTENSION OF**
) **TIME TO FILE DEFENDANT'S RESPONSE TO**
) **PLAINTIFF'S COUNSEL'S MOTION FOR**
) **ATTORNEY FEES PURSUANT TO 42 U.S.C. §**
) **406(b)**
)

) **(FIRST REQUEST)**
)

1 Defendant, Kilolo Kijakazi, Acting Commissioner of Social Security (the "Commissioner"), by
2 and through his undersigned attorneys, hereby moves for a 30-day extension of time to file her response
3 to Plaintiff's counsel's motion for attorney fees pursuant to 42 U.S.C. § 406(b). This is Defendant's first
4 request for an extension. The current due date is May 17, 2022. The new date will be June 16, 2022. All
5 other deadlines will extend accordingly.

6
7 Defendant is seeking further clarification from the Social Security payment center on what the
8 total past due benefits and total withholding amounts are in this case. The notice of award did not
9 contain these amounts. We have contacted the payment center and they are researching the issue. As it
10 stands, the Commissioner cannot respond to Plaintiff's motion without this information. Defendant
11 apologizes to the Court for any inconvenience caused by this delay. We hope that the full requested
12 extension will not be necessary, but out of caution we are requesting a full 30 days.

13
14 It is therefore respectfully requested that Defendant be granted an extension of time to file her
15 response to Plaintiff's motion, through and including June 16, 2022.

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17
18 Dated: May 18, 2022

Respectfully submitted,

19 JASON M. FRIERSON
20 United States Attorney

21 /s/ Margaret Lehrkind
22 Margaret Lehrkind
23 Special Assistant United States Attorney
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IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: May 19, 2022